

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	
<b>v.</b>	:	<b>CRIMINAL NO. 22-cr-142</b>
<b>LAYE SEKOU CAMARA</b>	:	
<b>a/k/a “K1”</b>		
<b>a/k/a “Dragon Master”</b>		

**GOVERNMENT'S TRIAL MEMORANDUM**

The United States of America by its attorneys, Jacqueline C. Romero, United States Attorney, and Linwood C. Wright, Jr., Kelly Harrell, and Patrick Brown, Assistant United States Attorneys for the Eastern District of Pennsylvania, and Chelsea Schinnour Trial Attorney, United States Department of Justice, respectfully submits its Trial Memorandum in the above-captioned case.

**I. Procedural Background**

On May 4, 2022, a federal grand jury sitting in the Eastern District of Pennsylvania returned a one count indictment charging Camara with use of an immigration document (green card) obtained by fraud, in violation of 18 U.S.C. § 1546(a). After being charged in the Eastern District of Pennsylvania, Camara waived venue for his uses and possession of the same fraudulently obtained green card in the District of New Jersey and in the Eastern District of New York, respectively. Consequently, on January 25, 2023, an Eastern District of Pennsylvania grand jury returned a superseding indictment adding two counts of use of a fraudulently obtained immigration document, and one count of possession of a fraudulently obtained immigration document, all in violation of 18 U.S.C. § 1546(a).

## II. Statement and Nature of Case

### A. Historical Background

In 1822, freed American slaves settled on the western coast of Africa in the area that now encompasses Liberia, which became an independent republic in 1847. Liberia's landscape was dominated by the descendants of the settlers, known as "Americo-Liberians," even though Americo-Liberians comprised only five percent of Liberia's population. Liberia was never colonized by a foreign power, however the Americo-Liberian settlers administered a colonial style system of government that denied full civic rights to some of the indigenous tribal groups and relied on coercive force to maintain power. The historical marginalization of indigenous tribal groups and the violence inflicted on native Liberians created a deeply divided society and set the stage for Liberia's two civil wars that erupted in the latter decades of the twentieth century.

On April 12, 1980, a small group of Liberians soldiers seized power, killing President William Tolbert and other Americo-Liberian government officials, the group was led by Master Sargent Samuel K. Doe. Doe, a member of the Krahn tribe. Doe was Liberia's *de facto* ruler through 1985. In 1985, Doe was elected president in a rigged election. Despite this, Doe's government was recognized by the international community, including the United States.

Doe was an authoritarian ruler, first as Liberia's *de facto* leader and later as its president. He banned political activities and used the military to suppress dissent. He cultivated patronage systems that benefited his fellow Krahn tribesmen and elevated members of the Mandingo tribe, previously considered outsiders in Liberia, to favored economic and political status. At the same time, Doe sidelined former allies, in particular members of the Gio and Mano

tribes who helped bring him to power, largely if not completely excluding them from political society.

The Doe administration's corruption, repressive rule and favoritism fueled resentment among many in Liberia. Consequently, in the late 1980s, Charles Taylor, Jucontee Thomas Woewiyu and arguably Ellen Johnson Sirleaf, among others, as a core group, revived the National Patriotic Front of Liberia (NPFL), a then largely defunct rebel group. On December 24, 1989, NPFL forces led by Charles Taylor, attacked Liberia through the Ivory Coast and initiated an offensive aimed at overthrowing Doe. This was the beginning of Liberia's First Civil War.

The NPFL was met with fierce resistance by the Armed Forces of Liberia (AFL) along with fighters from the United Liberation Movement for Democracy in Liberia (ULIMO). ULIMO was largely comprised of Krahn and Mandingo tribesmen. In March 1994, ULIMO split into two wings, the Krahn dominated ULIMO-J and the Mandingo dominated ULIMO-K. The two wings of ULIMO waged war against one another, as well as on the NPFL.

Liberia's First Civil War was characterized by brutality, war crimes and atrocities on all sides. Summary execution and torturing of civilians, weaponized rape, ritualistic cannibalism and the use of child soldiers were the norm. Much of this conduct was based on ethnic divisions. In 1997, after approximately two years of interim governments, Charles Taylor was elected president of Liberia, in what was overwhelmingly accepted as a free and fair election.

Taylor's government was a kleptocracy buttressed by state-sponsored violence. Taylor's Anti-terrorism Unit and the Special Operations Division of the Liberian National Police were notorious for visiting atrocities upon Liberian citizens who were not in Taylor's favor. Consequently, in 1999 Liberia's Second Civil War began. Two rebel groups--Liberians United

for Reconciliation and Democracy (LURD), the Mandingo dominated successor to ULIMO-K, and the Movement for Democracy in Liberia (MODEL) the Krahn dominated successor to ULIMO-J-- battled Taylor's forces. LURD's stated objective was to remove Taylor from the presidency of Liberia. Liberia's second Civil War, much like its first, was known for its atrocities.

With the arrival of peacekeepers from the Economic Community of West African States, and facilitation by the government of the United States, on August 11, 2003, Taylor resigned as president of Liberia and went into exile in Nigeria. On November 8, 2005, Ellen Johnson Sirleaf was elected president of Liberia, and on January 16, 2006, she assumed the office.

## **B. Defendant Laye Sekou Camara**

### **1. Background**

Witnesses identified by name or number below,<sup>1</sup> will establish that during Liberia's Second Civil War, defendant Laye Sekou Camara, was a young LURD general who was also known as “K-1” and “Dragon Master.” They attribute numerous atrocities to Camara, including being personally responsible for numerous extrajudicial civilian deaths, by either personally executing civilians or aiding, participating, and assisting in the executions of civilians.

### **2. Camara’s False Representations to U.S. Immigration Authorities**

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<sup>1</sup> As previously discussed on the record at status conferences in this case, due to concerns for the witnesses’ safety in their home country of Liberia, the government intends to provide the names of the Liberian civilian witnesses to the defense prior to trial once the witnesses have arrived safely in the United States. The government will also provide their names to the Court. With the Court’s indulgence, the government also reserves the right to supplement this witness list.

On June 15, 2011, while presumably in Conakry, Guinea, Camara submitted a Form DS-160 (Temporary Non-Immigrant Visa Application) online to U.S. immigration authorities. In this application Camara asserted, among other things that he: 1) was not a member of a clan or tribe; 2) had never been a member or involved in a paramilitary unit, vigilante group, rebel group, guerrilla group, or insurgent organization; 3) had never ordered, incited, committed, assisted or otherwise participated in torture; 4) had never committed, ordered, incited, assisted, or otherwise participated extrajudicial killings, political killings, or other acts of violence; and 5) had never sought to obtain a visa, entry into the United States, or any other United States immigration benefit by fraud or willful misrepresentation or other unlawful means. On June 24, 2011, Camara's application for a visa was granted.

On August 11, 2011, Camara signed a DS-230 (Application for Immigrant Visa and Alien Registration). On June 14, 2012, Camara was interviewed by U.S. immigration authorities in Dakar, Senegal. At the conclusion of this interview Camara swore that the answers given in his DS-230 were truthful (as evidenced on the form). In his DS-230 Camara asserted, among other things that he had never: 1) participated, engaged or ordered genocide, torture, or extrajudicial killings; 2) sought or was seeking a visa, entry into United States, or any immigration benefit by fraud or misrepresentation; and 3) engaged in the recruitment or use of child soldiers.<sup>2</sup> Because of his misrepresentations, Camara's application was granted, and on

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<sup>2</sup> On May 14, 2012, while his August 11, 2011, DS-230 Application for Immigrant Visa and Alien Registration was pending, Camara submitted a second DS-160 Temporary Non-Immigrant Visa Application. His answers to questions posed in this application were similar to those in his June 15, 2011 DS-160 application in that he again asserted that he: 1) was not a member of a clan or tribe; 2) had never been a member or been involved with a paramilitary unit, vigilante unit, rebel group, guerrilla group, or insurgent organization; 3) had never committed, ordered, incited, assisted, or otherwise participated in torture; 4) had not committed, ordered,

November 22, 2012, he entered the United States through New York City with authorization for lawful permanent residency. As a result of his fraudulently obtained lawful permanent residency status, Camara was automatically entitled to the issuance of a U.S. permanent residence card (green card), and he received the green card.

### **3. Camara's Possession and Uses of his Fraudulently Obtained Green Card**

#### **i. PennDOT**

On June 21, 2017, Camara submitted in person at the Pennsylvania Department of Transportation's (PennDOT's) Island Ave., Philadelphia facility, an application for an initial Pennsylvania identification card. On his application, Camara listed 6441 Dicks Avenue, Philadelphia as his home address. In support of his application, Camara submitted his fraudulently obtained green card, which he had received as the result of the approval of his DS-230. Submission of Camara's green card was necessary for him to prove to PennDOT that he was lawfully in the United States.

#### **ii. New Jersey Board of Nursing**

During his residency in the United States, Camara has been employed as, among other things, a home health care aide in New Jersey. To practice as a home health aide in New Jersey, it is necessary to obtain a license from the New Jersey Board of Nursing (Board). To this end, on or about January 14, 2020, Camara submitted an online application to the Board for a home health care aide license. As supporting documentation to prove his lawful permanent

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incited, assisted, or otherwise participated in extrajudicial killings, political killings, or other acts of violence; and 5) had never sought to obtain or assist others to obtain a visa, entry into United States, or any other United States immigration benefit by fraud or willful misrepresentation or other unlawful means. Additionally, Camara asserted that he had never engaged in the recruitment or use of child soldiers.

residency in the United States, Camara submitted his fraudulently obtained green card.

**iii. Visiting Angels**

After receiving his home health care aid license, Camara sought employment at Visiting Angels, a New Jersey-based home health care agency. During the Visiting Angels application process, on or about February 25, 2020, Camara submitted his green card to Visiting Angels as proof of his lawful permanent residency in the United States.

**iv. Arrest at JFK International Airport**

On the evening of March 26, 2022, at approximately 9:40 p.m., HSI agents and CBP officers encountered Camara at JFK international Airport. Camara was departing the U.S. on an Ethiopian Airlines flight from JFK to Lomé, Togo. Camara had his Guinean passport and told agents that he was traveling to Guinea to visit his sick mother. Camara was subsequently arrested pursuant to a complaint and warrant issued in this case. At the time of arrest, Camara possessed, among other things, his fraudulently obtained green card.

**4. Camara's Status as a LURD Rebel Combatant and Conduct During Liberia's Second Civil War**

**i. Witnesses**

**a. Witness Number 24**

Witness Number 24 is a Liberian National who was in Liberia during both Liberian civil wars. He will testify to, among other things, his observations during the two civil wars including, but not limited to, his interactions with defendant Camara as a LURD commander during Liberia's Second Civil War. He will also testify about the plethora of LURD child soldiers accompanying and deployed by LURD commanders during Liberia's Second Civil War.

**b. John Blaney, former U.S. Ambassador to Liberia**

It is anticipated that retired Ambassador John Blaney will testify that, among other things, he recalls dealing with a LURD general named Dragon Master and another LURD commander named General Cobra during Liberia's Second Civil War. Blaney will authenticate videotapes in which he appears with General Dragon Master. Blaney knew General Dragon Master to be a high-ranking and active combatant in LURD, which he will describe as a large and formidable Liberian rebel group engaged in atrocities during Liberia's Second Civil War. Blaney will testify that General Dragon Master would not have been someone who met U.S. visa issuance criteria. Blaney will further testify that Defense Attaché Colonel Sue Ann Sandusky was also stationed at the American Embassy in 2003 and that she had more direct contact than he did with General Dragon Master.

**c. Dante Paradiso, former Consular and Political Officer at the United States Embassy, Monrovia, Liberia**

It is anticipated Dante Paradiso will testify that, among other things, in 2003 he was the consular and political officer at the United States Embassy in Monrovia, Liberia during Liberia's Second Civil War. During the war, he had contact with Camara on several occasions, although the late Colonel Sue Anne Sandusky was Camara's primary point of contact within the U.S. government. Camara, working with Sandusky, was responsible for assuring the safety of U.S. Embassy personnel who were crossing the bridge between Monrovia and Bushrod Island, which separated Charles Taylor's Monrovia-based forces from LURD rebel forces that controlled Bushrod Island. Paradiso, who was constantly with Blaney, was at peace talk meetings between Blaney and Camara's superior, LURD General Cobra. As a high-ranking LURD commander, Camara was also at these meetings, some of which are captured on video.



**d. Jonathan Stack, documentary filmmaker**

It is anticipated Stack will testify that, among other things, he is a documentary filmmaker. The documentary “Liberia, An Uncivil War” was his brainchild. The film was shot in Liberia during its Second Civil War. Stack produced the documentary, shot portions of it, and was wholly responsible for editing its raw footage. Camara is featured in several portions of the film. While in Liberia, Stack personally interacted with Camara, whom he knew to be a LURD leader.

**e. Carolyn Cole, Los Angeles Times photojournalist**

Cole is a Pulitzer Prize winning Los Angeles Times photojournalist. In August 2003 she was in Monrovia covering Liberia’s Second Civil War. While there, she photographed Camara amongst his rebel troops.

**f. Solomon Moore, former Los Angeles Times Reporter**

It is anticipated Moore will testify that, among other things, in August 2003, he was a Los Angeles Times reporter who was in Monrovia covering Liberia’s Second Civil War. While there, he interacted with defendant Camara, a LURD commander whom he knew as Dragon Master. He interviewed Camara for an article that appeared in the Los Angeles Times. He observed Camara meet with the late U.S. Defense Attaché Colonel Sue Ann Sandusky, who was the United States defense attaché assigned to Liberia at the time, and further observed Camara with child soldiers who were under his command.

**g. Witness Number 13**

Witness Number 13 will testify that, among other things, he is a member of the Sapo tribe who was born in Sinoe County. He grew up with his mother in Lofa County. In 1997, he moved to Caldwell, Monrovia with his uncle.

Witness Number 13 met K-1 while playing football (soccer) in Caldwell around 1998. They played on opposing teams. They were not close, but Witness Number 13 knew K-1 was Mandingo. Witness Number 13 knew K-1 as “Kamara” at the time. Witness Number 13 stopped seeing K-1 around 1999 but saw him again when LURD rebels came to the area around 2001.

During the Second Civil War, Witness Number 13 worked in private security and lived in Logantown. He describes that LURD rebels as being everywhere in Logantown, Jamaica Road, and the surrounding area, and they eventually took over all of Bushrod Island.

Witness Number 13 first saw K-1 with LURD rebels around 2001 at Beer Factory. K-1 was surrounded by rebels, including some soldiers as young as 6 to 9 years old and teenagers. K-1 appeared to be in charge of the group. K-1 only had a pistol, and the others had long guns.

On another occasion, Witness Number 13 encountered K-1 at a checkpoint at Logantown Market. Witness Number 13 was travelling back towards Logantown after picking up rice from his uncle in the Bong Mine Bridge area. Witness Number 13 was traveling with another uncle (“brother”). Because of LURD’s presence in the area, it was too dangerous to walk on the community road, so they walked on the main road. As they approached Logantown Market, K-1 arrived with a group of bodyguards and other rebels. Witness Number 13 estimates that the rebels with K-1 ranged in age from 10 or 11 years old to no older than 30. Witness Number 13 and others were carrying loads of rice on their heads, and K-1 accused them of them stealing the rice. K-1 then opened fire, killing approximately five people, including Witness Number 13’s uncle, who was shot in the neck. When K-1 opened fire, Witness Number 13 ran for his life and never looked back.

Witness Number 13 positively identified K-1 in a photo array.

**h. Witness Number 15**

Witness Number 15 will testify that, among other things, she is a member of the Sapo tribe who was born in Greenville, Sinoe County. During Liberia's First Civil War, around 1990, Witness Number 15 and her family moved to Monrovia.

Witness Number 15 was living in Logantown during Liberia's Second Civil War. When LURD rebels advanced towards Logantown the first time ("World War I"), Witness Number 15 moved to Gardnersville, but her mother stayed in Logantown. When the conflict subsided, she returned to Logantown. Witness Number 15 recalled the civilians celebrating in Logantown in 2003 because they heard that ECOMIL was coming to Freeport, and many civilians marched towards Logantown Cinema to celebrate. Witness Number 15's mother warned her to be cautious, and she turned back before reaching the Cinema, where LURD rebels opened fire on civilians. ECOMIL did not come.

A few weeks later, Witness Number 15's aunt from Sinoe County was visiting her and her mother in Logantown. Witness Number 15 and her aunt decided to go into town in search of food. There were many other civilians in town entering stores to get fish, flour, and other goods, and Witness Number 15 knew that if LURD rebels saw civilians in the stores they would shoot. Witness Number 15 and her aunt entered a store to get flour. While inside, other civilians exclaimed, "K-1 is coming!" K-1 was notorious in the area. Witness Number 15 reported that his name put fear into civilians because he would spray people with bullets when he saw them inside stores. Witness Number 15 left the flour and fled the store, but her aunt did not make it out of the store in time. While running away, Witness Number 15 fell down in a swamp. Ultimately, she was able to hide in a garage with other civilians until the shooting stopped. The next day, she

learned her aunt died from a community member whose son fought for LURD. Witness Number 15 stayed home until the war ended.

**i. Witness Number 5**

Witness Number 5 will testify that, among other things, he is a member of the Gola tribe who was born in Grand Cape Mount County. He and his family moved from Grand Cape Mount to Paynesville around 1997.

During 2003, Witness Number 5 lived with his older brother, and his brother's wife in Klay Town. His older brother worked as a fishmonger. One day around August 2003, Witness Number 5 accompanied his brother and his brother's wife to the main road in Klay Town to sell fish. While walking to the main road, they encountered a community member who was a member of LURD and often used to offer his brother protection while he sold and traded fish and rice. The LURD rebel offered to walk with them to Klay Town. When they arrived at the Klay Checkpoint, the rebel announced that Chief K-1 was coming. Witness Number 5 wanted to run into the bush to hide because he had heard about K-1 and was scared of him, but the rebel assured them that it was ok because he was with them. K-1 arrived in a Jeep with several armed bodyguards. K-1 accused Witness Number 5's brother of being ATU (Charles Taylor's Anti-Terrorism Unit). The rebel who had offered them protection tried to defend Witness Number 5's brother, and Witness Number 5 and his brother pleaded with K-1 that they had just been fishing and were not ATU. One of K-1's bodyguards hit Witness Number 5 in the head with the butt of his gun, and K-1 ordered other rebels to take Witness Number 5 away from him. They tied Witness Number 5 duckfa tabay and put him in the back of a pickup. K-1 shot Witness Number 5's brother in the head, killing him. Afterwards, K-1 took Witness Number 5's brother's wife to

ride with him in his Jeep. Other rebels drove Witness Number 5 away and took him to a detention center in Tubmanburg, where he was held for a few days before another rebel helped him escape. Witness Number 5 never saw his brother's wife again.

Witness Number 5 positively identified K-1 in a photo array.

**j. Witness Number 9**

Witness Number 9 will testify that, among other things, he is a member of the Vai tribe who was born in Duala, Montserrado County. He moved to Sierra Leone to live with his aunt when he was about 5 years old and returned to Monrovia around 1996.

Witness Number 9 lived in Claratown when World War III started in 2003. K-1's name was infamous in Claratown during this time, as he was known to shoot at groups of civilians. When K-1 was nearby, people would announce, "K-1 is coming" as a warning and civilians would run away. On one occasion, Witness Number 9 accompanied his 20-year-old sister to buy food at a shop in Claratown. His sister had just given birth one week before to a baby boy. As Witness Number 9 and his sister were walking back to their house (along with other civilians in the vicinity), K-1 arrived in the area in a white Jeep with his bodyguards. K-1 opened fire on the civilians, and his bodyguards followed his lead and also began shooting. The civilians scattered, "running for their lives," as Witness Number 9 describes it, and he was separated from his sister. Afterwards, Witness Number 9 returned to the area to look for his sister and found her dead, having sustained a gunshot wound to her leg and bled out. He carried her body home and buried her. Witness Number 9 raised his sister's baby and other children with his own. After United Nations Mission in Liberia (UNMIL) soldiers arrived at the end of the war, Witness Number 9 went to look for K-1 in Bomi County to avenge his sister's death but was stopped by UNMIL

soldiers.

**k. Witness Number 8**

Witness Number 8 will testify that, among other things, he is a member of the Mano tribe who was born in Nimba County. He moved to the Paynesville area of the Greater Monrovia around 1997.

When the war came to Monrovia in 2003, Witness Number 8 worked in the jewelry business with R.K. R.K. regularly bought goods from the LURD rebels and resold them. On one occasion, R.K. called Witness N's umber 8 to go to the Freeport area. When they arrived, the area was occupied by LURD rebels. The rebels began warning the crowd, "K-1 is coming!" as two pickup trucks approached. When the trucks arrived, K-1 stood up on one of them and began giving orders. Civilians began running away to escape and LURD forces opened fire. Witness Number 8 and R.K. attempted to leave and were stopped by K-1. K-1's bodyguards ordered them not to move, tied them duckfa tabay, and stole their money. The bodyguards put R.K. in the back of a pickup with other civilians who were also tied. Witness Number 8 was also going to be loaded into the truck, but J.D., a rebel who knew him, intervened and asked for his release. R.K. and others were driven away in the pickup truck, and Witness Number 8 never saw R.K. again.

K-1 ordered the rebels to kill everyone in the port. Shooting started. Several civilians were killed, and their bodies were loaded into shipping containers so the cameras (press) wouldn't see.

Witness Number 8 saw K-1 on another occasion in Tubmanburg when Witness Number 8 was with J.D. again. Witness Number 8 explained that he often traveled with J.D. after what

happened to R.K. because he needed the protection that traveling with a LURD soldier offered. K-1 was in the same silver pickup truck that Witness Number 8 had seen him in before. K-1 and his bodyguards began stopping civilians carrying food, claiming the civilians were reconnaissance. The civilians (approximately 15 people) were loaded into the back of a pick-up and taken down a ditch, where K-1 ordered his bodyguards to shoot them. At the time, Witness Number 8 was in a second pickup truck with J.D. and other LURD soldiers who had followed K-1's truck. During this incident, Witness Number 8 learned that K-1 was also known as "General Dragon Master."

Witness Number 8 positively identified K-1 in a photo array.

#### **I. Witness Number 12**

Witness number 12 will testify that, among other things, he is a member of the Mandingo tribe who was born in Nimba County. He currently resides in Monrovia and has worked in a trucking business in the Freeport area since 1998.

Witness Number 12 knew Camara as "K-1" and "Dragon Master," and also knew his full name to be Sekou Camara. He saw K-1 more than four times during the war in 2003.

Witness Number 12 reported that sometime around June 2003, he encountered K-1 at Freeport. Witness Number 12 came to Freeport in search of food with about 10 to 15 others. While attempting to leave Freeport with a bag of rice, K-1 held Witness Number 12 at gunpoint with an AK-47 and accused him of looting. K-1 ordered Witness Number 12 to "give [him] six feet," a common rebel saying known to mean "back up so I can shoot you from a distance." Witness Number 12 spoke Mandingo to K-1, but that did not deescalate the situation. K-1 instructed Witness Number 12 to lay down and then beat him with the leather part of his

bodyguard's belt, doling out 25 lashes. K-1 also sliced Witness Number 12's leg with a knife. Ultimately, a woman named M who seemed to know K-1 intervened, telling him that Witness Number 12 was her brother. M took Witness Number 12 to her house in Logantown where she helped care for his bleeding leg wound.

About a week later, Witness Number 12 witnessed K-1 kill another LURD fighter named Langassa, who was around 20 years old. Witness Number 12 was driving to Freeport with two friends when he saw Langassa tied duckfa taba'y on the street with K-1 and his bodyguards. Witness Number 12 and his friends stopped their car and exited because they feared K-1's response to seeing them in a vehicle. K-1 confronted Langassa about stealing headphones. Langassa pleaded for his life and asked the small crowd to tell his family in Guinea that his own people (Mandingo/LURD) had killed him. K-1 took another rebel's gun and shot Langassa multiple times in the side and torso. K-1 then told the crowd to leave Langassa's body for three days (in violation of the Islamic funeral traditions) as a sign for everyone to see he had killed a fellow Mandingo.

On another occasion near the end of the war, just a few days before Charles Taylor's resignation (8/11/2003), Witness Number 12 saw K-1 shoot and kill several civilians inside the Freeport. Witness Number 12 was inside the Freeport when another LURD general "Iron Jacket" called K-1 on a radio to alert him that there were a lot of civilians "looting" (i.e., looking for food because they were starving) in the port. K-1 arrived shortly thereafter in a white pickup truck, and Witness Number 12 hid behind a container for safety. Iron Jacket shot in the air to disperse the civilians. K-1 shot and killed five or six male civilians.

Witness Number 12 positively identified K-1 in a photo array.



**m. Witness Number 17**

Witness Number 17 will testify that, among other things, he is a Lorma male who was born in Kakata, Margibi County, and grew up in the Firestone/Harbel area.

During the Second Civil War, Witness Number 17 lived and worked in Monrovia. His older brother had been a member of Charles Taylor's government forces and was killed by LURD during "World War I" around 1999 in the area of the Gabriel Tucker Bridge. During the war, Witness Number 17 often traveled to Freeport to buy food and returned to Monrovia to resell the food to civilians on the side of Monrovia controlled by Taylor's government forces. This was very dangerous, as it required crossing the dividing line between government and LURD forces and entering the Freeport controlled by LURD.

Witness Number 17 encountered K-1 at Freeport. Witness Number 17 was inside the port acquiring food with his friend Bob Gray, when K-1 entered the port and opened fire on the civilians inside, shooting and killing Bob Gray. Another LURD general named "Iron Jacket" was also there and intervened to stop K-1 from shooting more civilians. K-1 and his bodyguards rounded up Witness Number 17 and other civilians, tied them, and put them in the back of a pickup. Witness Number 17 and other civilians were driven to Claratown in the back of the pickup while Iron Jacket rode in the front. Their truck was part of a convoy that also included K-1. The convoy continued to travel towards Beer Factory. Eventually, Iron Jacket freed Witness Number 17 and the other civilians by telling K-1 to let them go.

Witness Number 17 positively identified K-1 in a photo array.

**n. Witness Number 11**

Witness Number 11 will testify that, among other things, he is a member of the Mende tribe who was born in Grand Cape Mounty County. He moved to Monrovia when he was about 12 years old.

On one occasion around August 2003, Witness Number 11's friend, LURD fighter M.F., invited Witness Number 11 and his aunt to drive with him to Freeport to get food. Upon arrival, the LURD rebels controlling the Freeport allowed them inside because they knew M.F. There were many other civilians inside the port searching for food. While Witness Number 11 and his aunt were inside the port, people began yelling, "K-1 is coming!" and "General Dragon is coming!" Shortly thereafter, K-1 arrived in a pickup, yelling about how the people inside the port were not civilians but reconnaissance. K-1 then opened fire, causing everyone inside to run, duck, and scatter to try to escape. Witness Number 11's aunt was shot in the back of her head and killed. Witness Number 11 fell down near her and pretended like he was dead. About 15 minutes later, after the shooting subsided, M.F. came to look for him and helped him get up and escape.

As Witness Number 11 was leaving the port, however, LURD rebels arrested him and put him in the back of a pickup truck with other civilians. The rebels took them to the St. Paul Bridge area where the arrestees were beaten. Later, M.F. arrived and freed him by telling the other rebels that he was not reconnaissance and that M.F. had taken him to the port.

Witness Number 11 positively identified K-1 in a photo array.

**o. Witness Number 19**

Witness Number 19 will testify that, among other things, he is a member of the Kissi tribe who was born in Lofa County.

During “World War III” in 2003, Witness Number 19 lived in the St. Paul Bridge area with his uncle. While LURD had advanced towards the area on prior occasions (World War I and II), the forces did not take over the St. Paul Bridge area until 2003. During this time, Witness Number 19 reported that the whole community was controlled by LURD, all the way to Vai Town.

Witness Number 19’s cousin fought for LURD and often helped the family obtain food during the war. LURD controlled the Freeport in 2003, and Witness 19 often went to the port at night with his cousin to get rice for the family. Witness 19 also took goods like car parts and electronics from the port to resell for a profit. On one occasion, during the same week that LURD first entered the St. Paul Bridge area, Witness 19 was driving to the port with his cousin to get food when they encountered K-1 in the Logantown area. They stopped; Witness 19’s cousin briefly spoke to K-1, and Witness 19 and his cousin continued to the port. When they arrived at the port, Witness 19’s cousin left him with his bodyguards and told him to wait there. One of the bodyguards named K. gave Witness 19 a gun. A short time later, K-1 arrived in the port in a pickup, followed by several other pickups filled with rebels. K-1 ordered other rebels to fire on civilians in the port, and they started shooting. Witness 19 ran, hid behind a container, and dropped the gun that had been given to him. After the shooting subsided, K. found Witness 19 behind the container and walked him out into the port area. Witness 19 observed several dead bodies, including some LURD soldiers and a pregnant woman.

On one occasion, while looking for food and other goods in a container at the port, Witness 19 came across about 10 to 15 dead human bodies inside a container. Witness 19 knew that LURD generals would shoot “looters” and put their bodies in the containers to avoid the “satellite” (i.e., media cameras).

On another occasion, Witness 19 encountered K-1 at Beer Factory, which he described as a “soft base” for LURD where members of their top brass would stop. Witness 19 knew that LURD’s main base was in Tubmanburg, Bomi County. Witness 19 was driving in the Beer Factory area towards the Sierra Leone border to sell goods from the port.

Witness 19 positively identified K-1 in a photo array. He also identified K-1 in a photo of LURD rebels at Freeport.

**p. Witness Number 14**

Witness Number 14 will testify that, among other things, he is a Mandingo male who worked as a mechanic on Bushrod Island during Liberia’s Second.

On one occasion, while at the Freeport, he was conscripted by Camara to load rice onto Camara’s truck. After loading the truck, he accompanied Camara, and Camara’s bodyguards to the Doe community where Camara divided the rice between Christians and Muslims in that community. On another occasion, Witness Number 14 was headed towards the Freeport when he saw civilians running away from the port yelling, “K-1 is coming!” Witness Number 14 hid near a mosque and observed four teenage boys running away from Camara. Camara shot one of the teenage boys, killing him.

Witness Number 14 positively identified Camara from a photo array.

**q. Witness Number 10**

Witness Number 10 will testify that, among other things, he is a member of the Kru tribe who was born in Sinoe County.

In 2003, during the “LURD rebel war,” also known as “World War III,” Witness Number 10 was living with his sister in Vai Town. When LURD rebels invaded Vai Town, Witness Number 10 and his sister fled to their uncle’s house in nearby Claratown. Food was in short supply and, on a few occasions, Witness Number 10 went to Freeport in search of food for himself and his family. Witness Number 10 describes Freeport as a LURD rebel base. On one occasion, K-1 arrived at Freeport in a white pickup truck while Witness Number 10 was inside looking for food with many other civilians. K-1 fired into the port and authorized his soldiers to shoot, as well. Panic ensued, and Witness Number 10 fled, dropping the bag of rice that he had obtained.

Witness Number 10 also went to the Bridge Way Warehouse in search of food. On one occasion while Witness Number 10 was there, K-1 showed up with other LURD soldiers and accused everyone in the store of being looters. K-1 shot into the store, killing three people.

After the war, Witness Number 10 and other civilians banded together to march to K-1’s house in Jamaica Road, but K-1 had escaped to Guinea.

Witness Number 10 positively identified K-1 in a photo array.

**r. Witness Number 20**

Witness Number 20 will testify that, among other things, he is a Gola male who was born in Bomi County, Liberia. He grew up in Bomi County and lived with his father in Tubmanburg in 2003.

As the “LURD war” moved through Bomi County in 2003, when Witness Number 20 was about 19 years old, he often traveled to the Freeport area of Monrovia in search of food, sometimes with his childhood friend, S., who fought for LURD. Witness Number 20 felt protected when traveling with S. because he was in LURD.

On a few occasions in 2003, Witness Number 20 saw a LURD general known as “Chief K-1.” Witness Number 20 reported that he learned the general’s name because he heard the general’s bodyguards use it to address him. Witness Number 20 knew that K-1 controlled the Freeport, where civilians often traveled in search of food.

Witness Number 20 first encountered K-1 in the St. Paul Bridge area when K-1 stopped a group of civilians attempting to cross the bridge towards Monrovia. One woman with a little boy (approximately 7 to 8 years old) and a toddler girl on her back insisted that she needed to cross the bridge to get food. Witness Number 20 witnessed K-1 shoot the woman’s children and dump their bodies in the river.

On another occasion, Witness Number 20 went to the Freeport with S. and another friend to get food. S. waited outside in a parked pickup, and Witness Number 20 and others entered the port to obtain food. As the men carried food out of the port on their heads, they encountered K-1 who accused them of looting. K-1 shot and killed Witness Number 20’s friend. Witness Number 20 fled and jumped over a fence, cutting his right upper arm in the process.

Witness Number 20 positively identified K-1 in a photo array.

**s. Witness Number 2**

Witness Number 2 will testify that, among other things, he is a 42-year-old Kpelle male who was born in Bong County. When he was about 14 years old, he moved to Lofa County to

live with his uncle and work on his uncle's farm.

When Witness Number 2 was about 20 years old in 1999, he and his uncle were forcibly conscripted into LURD forces led by K-1, also known as General Dragon Master. When LURD soldiers entered Lofa County, Witness Number 2 and his uncle (with many other civilians) fled into the bush. LURD rounded up civilians from the bush and conscripted them as rebels. When Witness Number 2's uncle refused, LURD cut off his ear, forcing Witness Number 2 and his uncle to join LURD out of fear of harm or death. Witness Number 2 and his uncle accompanied LURD rebels southwest from Lofa County through Gbarpolu County, Bomi County, and into Montserrado County, passing through villages and forcibly conscripting more civilians as soldiers along the way. These forced conscripts included teenagers and children.

Witness Number 2 recalled one particular incident where the mother of a 13-year-old boy pleaded with LURD not to take her son because he was so young. If people refused, K-1 gave the order to "carry them halfway," which meant to execute them. Witness Number 2 witnessed K-1 shoot and kill some who refused and also heard K-1 give orders to other soldiers to do the same.

Witness Number 2 recalled two battles with government forces that occurred on LURD's journey to Montserrado County, one in Bomi County at Seuhn Mecca and one at the Po River Bridge, the border between Bomi and Montserrado County. After defeating government forces at Po River, LURD crossed the bridge and took over, having gained control of Lofa and Bomi Counties. During these battles, K-1 and others gave guns to child and teenage forcibly conscripted soldiers to fight on the front lines and, if they complained that they did not know how to use the guns, they would be executed on the spot.

LURD forces advanced as far as Vai Town to the Gabriel Tucker Bridge. By that time,

Witness Number 2 was acting as a bodyguard to K-1. Witness Number 2 worked in this capacity for about a year from during 2002 and 2003 and often traveled with K-1. At any given time, K-1 had about 12 bodyguards with him. Witness Number 2 estimated that K-1 killed over 100 people (not including government soldiers), especially child soldiers who were refusing to use/shoot their guns, and Witness Number 2 personally witnessed many of these killings, including in the Freeport. Witness Number 2 described Freeport as a “war zone,” and accompanied K-1 there multiple times, but not every time K-1 went there.

Witness Number 2 positively identified K-1 in a photo array.

**t. Witness Number 4**

Witness Number 4 will testify that, among other things, he is a member of the Sapo tribe who grew up in New Kru Town, Monrovia on Bushrod Island.

Witness Number 4 recalls the LURD rebels entering his town during the war in 2003. One of his friends from football (soccer) joined LURD and helped Witness Number 4 obtain food for himself and his family. Witness Number 4 had two encounters with K-1 during 2003.

On the first occasion, Witness Number 4 went to Claratown in search of food and other items. K-1 arrived in the area with several other rebels and opened fire on civilians in the market area. As K-1 approached in his jeep, people exclaimed, “K-1 is coming!” as a warning to other civilians. Witness Number 4 ran inside a store and jumped behind a counter to hide, cutting his back in the process. He stayed there until K-1 left the area. When Witness Number 4 emerged from hiding into the open market area about 5 minutes later, he observed about 15-30 people (men, women, children, and pregnant women) shot dead outside.

About a week later, Witness Number 4 saw K-1 in the Freeport area. Witness Number 4



had gone to Freeport in search of food and loaded up his backpack. K-1 arrived while Witness Number 4 and other civilians were leaving the port with food. A pregnant woman carrying flour on her head was walking ahead of Witness Number 4 with two boys. Upon seeing K-1, she dropped the flour to the ground and raised her hands in the air, begging K-1 please not to shoot her. K-1 shot her and the two boys with her. While K-1 continued firing at civilians, Witness Number 4 ran back into the port and jumped over a fence, hiding in bags of flour until the shooting subsided. After this incident, Witness Number 4 stayed inside until the war ended.

Witness Number 4 positively identified K-1 in a photo array.

## **5. Camara's Immigration Status**

### **i. Witnesses**

#### **a. Sherry McCall, United States Citizenship and Immigration Services**

McCall will introduce Camara's alien file into evidence. This file includes U.S. Department of State immigration forms executed by Camara.

#### **b. Andrea Whiting, United States Department of State**

Whiting will, among other things, explain the United States Department of State requirements and process for entry into the United States by foreign nationals, and the importance and effect of the attendant Department of State forms.

#### **c. Andrew Devlin, Former United States Department State Vice Consul**

Devlin will testify to, among other things, his role in the immigration process and that while working in Dakar, Senegal, he interviewed Camara to make a determination of whether Camara's application for an immigrant Visa and Alien Registration (DS-230) should be granted. He will further testify that, although he does not have a specific recollection of Camara, had

he known Camara was a member of a rebel group, involved with child soldiers or extrajudicial killings, he would have, among other things, denied Camara's application.

**d. Natalie Duffy, United States Citizenship and Immigration Services**

Duffy will testify to, among other things, the circumstances under which an immigrant is entitled to a green card, and the benefits conferred upon an immigrant as a result of his receipt of a green card.

**6. Camara's Possession and Uses of Fraudulently Obtained Green Card**

**i. Witnesses**

**a. Jennifer Thompson or designee, PennDot**

Thompson or her designee, will testify about the process for obtaining a Pennsylvania State non-driver's license identification card, as well as introduce into evidence Camara's application for a non-driver's license identification card and the application's supporting documents.

**b. Virginia Burks, New Jersey Board of Nursing**

Burks or her designee, will testify about the process of obtaining a license from the New Jersey Board of nursing to act as a home health aide, as well as introduce into evidence Camara's application for a home health care aide license and the application's supporting documents.

**c. Kathie Burbek or designee, Visiting Angels**

Burbek will testify about the application process to become a home health aide for Visiting Angels, as well as introduce into evidence Camara's application to visiting Angels and the application's supporting documents.

**d. Tom Eyre, Special Agent, Homeland Security Investigations**

Eyre will testify, that among other things, he presented photo arrays to various witnesses in this case from which they positively identified Camara. He will also testify that on March 26, 2022, in the Eastern District of New York, he arrested Camara and recovered, among other things, Camara's green card and electronic devices.

**e. Sidikie Kamara, Special Agent, Pennsylvania Office of the Attorney General**

Kamara will testify that, among other things, he observed photo arrays being presented to various witnesses in this case, and observed those witnesses positively identify Camara in those photo arrays. He will further testify that on March 26, 2022, in the Eastern District of New York, he participated in the arrest of Camara and recovered, among other things, Camara's green card and electronic devices.

**7. Camara's Uses of Child Soldiers**

**i. Witnesses**

**a. Anselm Crombach, Psychologist, Expert Witness on Child Soldiers**

Crombach will testify as an expert witness about, among other things, the advantages to rebel commanders of using child soldiers and the effect that this use has on the child.

**b. Witness Number 21**

Witness Number 21 will testify that, among other things, he was conscripted as a driver for Camara. While driving for Camara he (Camara) ordinarily sat in the front seat and was accompanied by child soldiers who were seated behind him. If Camara was unarmed and needed a gun to shoot someone, a child soldier would provide the necessary gun to Camara. Camara ordered child soldiers to beat various adult civilian victims. The victims did not resist because to

do so would result in their deaths.

Witness Number 21 will further testify that he saw Camara kill more than ten civilians at warehouses in the Freeport.

**c. Witness Number 18**

Witness Number 18 will testify that, among other things, he is a member of the Mandingo tribe who was born in Bong County. Witness number 18 grew up in Bong County and met K-1 when he (Camara) was about 12 or 13 years old in Suakoko, Bong County. Witness number 18 later moved to Macenta, Guinea with his family and returned to Liberia to live in Monrovia around 1996.

Witness Number 18 recalls July 2003 when LURD rebels entered Monrovia. At the time, Witness Number 18 was living in the New George area with his family. LURD forces brought the civilians in New George out of their homes and told them that they could go to the Freeport to get food. Witness Number 18 and others went to Freeport to get food. While walking back from Freeport, the civilians came upon fighting between LURD and Charles Taylor's soldiers at the Jamaica Road Bridge. Witness Number 18 stayed in a hotel in the area with other displaced civilians for approximately three weeks until a ceasefire.

After the ceasefire, Witness Number 18 returned to New George and then went to visit his younger brother, M.K., in Bomi. Witness Number 18 reported that M.K. fought for LURD. While Witness Number 18 was visiting his brother, he also saw K-1 there. Later, Witness Number 18 learned from another brother that after Witness Number 18 left Bomi, K-1 killed M.K. during an argument. Witness Number 18's father told the family that they would not seek retribution for M.K.'s killing.

M.K. was shown a single photo of K-1 and positively identified him.

**8. Additional Identifying Evidence**

**i. Witnesses**

**a. Mark Hansen, Homeland Security Investigations, Computer Forensics Analyst**

Hansen will testify recovering text messages from mobile devices possessed by Camara, in which he is referred to as, responds to, or refers to himself as, either K-1 or Dragon.

**b. Christina Loughrin, Homeland Security Investigations, Computer Forensics Analyst**

Loughrin will testify to recovering text messages from mobile devices possessed by Camara, in which is referred to as, response to, or refers to himself as, either K-1 or Dragon.

**III. Preliminary Government exhibit list<sup>3</sup>**

1. Historical Background on Liberia;
1. Map of the continent of Africa;
2. Map of West Africa region;
3. Map of Liberia;
4. Map of Monrovia/Bushrod Island;
5. Photograph of Charles Taylor;
6. Alien Registration file for Laye Sekou Camara;
7. PennDOT application for a Pennsylvania non-driver's license ID for Laye Sekou Camara, and supporting documentation, including but not limited to, a copy of Laye Sekou

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<sup>3</sup> The government intends to provide the Court and defense with an updated, final exhibit list prior to trial. Because the government has not yet settled on an order of proof, the numbers assigned to the government's exhibits in this memorandum will likely not match the exhibit numbers assigned to the government's exhibits at time of trial. With the Court's indulgence, the government reserves the right to supplement this list by adding exhibits prior to trial and/or as the testimony at trial develops.

Camara's green card;

8. New Jersey Board of Nursing application for a home health care aide license for Laye Sekou Camara, and supporting documentation, including but not limited to, a copy of Laye Sekou Camara's green card;
9. Visiting Angels employment application for Laye Sekou Camara, including but not limited to, a copy of Laye Sekou Camara's green card;
10. Green card for Laye Sekou Camara;
11. Pennsylvania identification card for Laye Sekou Camara;
12. Copy of Pennsylvania driver's license for Laye Sekou Camara;
13. Business card for Cellcom Guinea in the name of "Camara Laye Sekou;"
14. Three telephones seized from Laye Sekou Camara;
15. Liberia, an Uncivil War;
16. A Journey Without Maps;
17. August 2003 Photograph of Laye Sekou Camara taken by Los Angeles Times photojournalist Carolyn Cole;
18. August 2003 Los Angeles Times newspaper article written by Solomon Moore;
19. Photograph of LURD child soldier taken by photojournalist Gregory Stemn;
20. Photo array E shown to Witness Number 2;
21. Photograph of Witness Number 2's foot injury;
22. Photo array F shown to witness Number 4;
23. Photograph of Witness Number 4's ankle injury;
24. Photograph of Witness Number 4's back injury;
25. Photo array E shown to Witness Number 5;
26. Photo of Witness Number 5's head injury;

27. Photo array E shown to Witness Number 8;
28. Photo array G shown to Witness Number 10;
29. Photo array E shown to Witness Number 11;
30. Photo array F shown to Witness Number 12;
31. Photograph of witness 12's knee injury;
32. Photo array F shown to Witness Number 13;
33. Photo array C shown to Witness Number 13;
34. Photo array F shown to Witness Number 14;
35. Photo array F shown to Witness Number 17;
36. Single photo shown to Witness Number 18;
37. Photo array B shown to Witness Number 18;
38. Photo array F shown to Witness Number 19;
39. Photo array G shown to Witness Number 20;
40. Photograph of Witness Number 20's injured shoulder;
41. Photo array F shown to Witness Number 21;
42. Video clip of bridge to/from Bushrod Island;
43. Video clips of Mesurado compound;
44. Video clip of Beer Factory;
45. Video clips of Freeport;
46. Photographs of U.S. Department of Defense Attaché Sue Ann Sandusky;
47. Downloads from telephones seized from Camara, including but not limited to, various photographs and text messages in which Camara refers to himself as, and/or responds to the names K-1 or Dragon.





#### **IV. Stipulations between the Parties**

1. The defendant has executed a waiver of venue thus permitting the government to charge him in Counts Two, Three, and Four of the Superseding Indictment with violations of 18 U.S.C. § 1546 (a).

2. The parties have stipulated that, because the government returned the defendant's driver's license to him at his request, a photocopy of that license is a true and accurate copy of the original, and the photocopy is properly admissible and may be admitted in lieu of the original.

#### **V. Estimated Length of Government's Case**

The government estimates that its case will take approximately two- and one- half weeks to present.

Respectfully submitted,

JACQUELINE C. ROMERO  
United States Attorney

/s/ Linwood C. Wright, Jr.  
LINWOOD C. WRIGHT, JR.  
KELLY M. HARRELL  
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United States Department of Justice

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Government's Pretrial Memorandum was filed electronically on the Electronic Case Filing system, is available for viewing and downloading from the ECF system, and/or was served electronically on the following:

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DATED: December 12, 2024